

\*\*ILPD notes that it is sending two attorneys to the OCCs for surge detailees, and has another attorney on maternity leave for the next 8 weeks.

## II. USC Claim Reviews

Pursuant to ICE Directive 16001.2, *Investigating the Potential U.S. Citizenship of Individuals Encountered by ICE*, ILPD is responsible for OPLA-HQ review of U.S. citizenship claims.

Between January and March 2016, ILPD reviewed 293 claims to U.S. citizenship, which took ILPD 8,763 minutes to review (an average of 30 minutes per claim). During the same period in 2017, ILPD reviewed 243 claims to U.S. citizenship; however, due to the increasing complexity of U.S. citizenship claims reviewed by OPLA, ILPD spent 12,356 minutes reviewing these claims (an average of 51 minutes per claim).

ILPD Time - USC Claims		
	2016	2017
Total Claims Reviewed (Jan.-Mar.)	293	243
ILPD Review Time (Minutes)	8763	12356
Hours per Quarter (per ILPD Attorney)	9.128	12.87

Notably, ILPD's receipt and review of USC claims has continued to grow, with ILPD having received and reviewed 675 USC claims memoranda in FY 17 (through June 30, 2017).

## III. Automatic/Discretionary Stay Reviews

ILPD reviewed 15 proposed automatic/discretionary stay requests from the OCCs in FY16 (Oct.-June), and 28 during the same period in FY17. Due to the need to thoroughly review the record, complete a memorandum to file regarding ILPD's decision, review filings, and when an automatic stay is utilized track the case for filing of a discretionary stay motion (which also must be reviewed by ILPD), it is not unusual for ILPD to spend between 4-6 hours on each stay case.

The use of stays by the OCCs has increased dramatically in the past two months, and we expect that the recommended use of stays will continue to increase exponentially.

Exhibit C to Stevens Decl.

August 13, 2019